

From: [Greensley, Jean](#)
To: [Bardo, Kenneth](#)
Subject: RE: Solutia, Sauget, IL - Disposal of PCB-Containing Soil from Adjoining Property
Date: Monday, June 24, 2013 9:02:24 AM

Sure.

Jean M. Greensley, Geologist
U.S. Environmental Protection Agency
Corrective Action Section 1
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greensley.jean@epa.gov

-----Original Message-----

From: Bardo, Kenneth
Sent: Friday, June 21, 2013 11:21 AM
To: Greensley, Jean
Subject: FW: Solutia, Sauget, IL - Disposal of PCB-Containing Soil from Adjoining Property

jean, could you help me with this later this summer?

From: Rinaldi, Gerald M [gmrina@solutia.com]
Sent: Friday, June 21, 2013 10:16 AM
To: Bardo, Kenneth
Cc: Johnson, William G; McNurlen, Nathan
Subject: Solutia, Sauget, IL - Disposal of PCB-Containing Soil from Adjoining Property

The communication below concerns Solutia Inc.'s plans, as part of our RCRA corrective action at the W. G. Krummrich Plant and previously communicated to you, for excavation and disposal of PCB-containing soil from the Alton & Southern (A&S) Railway property immediately south.

Solutia recently met with A&S (including the new General Manager of their East St. Louis, IL, operations), and we expect to meet again in early August. Assuming Solutia and A&S agree to a plan including the disposal strategy below, Solutia will then submit to US EPA Region 5 TSCA a "notification and certification" consistent with 40 CFR 761.61(a)(3). Solutia would appreciate your assistance, as appropriate, with US EPA's action on that submittal.

Please let me know if you have any questions.

G. M. (Jerry) Rinaldi
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-----Original Message-----

From: Bardo, Kenneth [<mailto:bardo.kenneth@epa.gov>]
Sent: Wednesday, June 19, 2013 9:23 AM
To: McNurlen, Nathan

Subject: FW: PCB Waste Disposal

nathan, i was forwarded the e-mail below since i am the corrective action project manager at the Solutia Sauget facility. is this associated with one of their cleanups, either under CERCLA or RCRA? have you resolved this issue? please update me if you need assistance.

thanks, ken

-----Original Message-----

From: Palmer, Dave

Sent: Wednesday, June 05, 2013 7:43:32 AM

To: Hedman, Susan

Cc: McNurlen, Nathan

Subject: Disposal of PCB impacted soil <50ppm

Susan,

I apologize in advance, as this process is new to me. I received your contact information from Jackie Rosko with Waste Management (WM) in East St. Louis, Illinois. We had been discussing transport and disposal options for a potential upcoming excavation project in Sauget, Illinois.

The scope includes excavation of PCB impacted soil – some of it with Total PCBs >50ppm, which we had planned to dispose of at a TSCA landfill (WM facility in Emelle, Alabama). However, we were also hoping to dispose of the soil with Total PCBs <50ppm at the WM facility in East St. Louis (Milam RDF).

Jackie told us “For a Subtitle D disposal option for <50ppm, USEPA approval under 40 CFR 761.61(a) or (c) is required since Subtitle D landfills do not have a TSCA permit. As a TSCA waste, the soil cannot be certified non-special and must be managed as a manifested special waste”.

This process is new to me – what information would you need to consider/approve a Subtitle D disposal option?

So you know, today is my last day with URS. Nathan McNurlen (cc'd) will replace me and be our point of contact.

Let me know if you have any questions/comments/concerns

Thanks,

Dave Palmer, PG

Project Manager

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